



October 20, 2005

Robert Stone, Hazardous Materials Specialist
Humboldt County Local Oversight Program
Humboldt County Department of Health and Human Services
Division of Environmental Health
100 H Street, Suite 100
Eureka, California 95501

RE: Response to Workplan Approval Letter dated August 22, 2005

Big Oil & Tire Station # 120 – Bigfoot Service Station (Bigfoot Gas)
2801 Central Avenue
McKinleyville, CA 95519

LOP # 12365

Dear Mr. Stone:

In response to HCDEH letter, dated August 22, 2005, SounPacific proposes the following clarifications and recommendations in response to the August 3, 2005 *Subsurface Investigation Work Plan*:

- Since previous subsurface investigations have suggested that soil contamination resides throughout the site at relatively shallow depths based on analytical results, SounPacific proposes collecting soil samples relative to this shallow contamination in addition to four-foot intervals, changes in lithology, zones of obvious contamination, and at the soil/groundwater interface. The actual depth of these shallow samples will be dependant on the sampling locations proximity to a potential source, such as sampling locations adjacent to piping runs will be just below the depth of the pipe line, i.e. two feet bgs, whereas, sampling locations adjacent to dispensers may be collect as shallow as one foot bgs.

- SounPacific proposes to collect soil and groundwater samples (following the above-proposed guidelines for soil sample collection) from borings PB-19 and PB-20. The collection procedures that will be used were outlined in the approved Workplan, dated August 3, 2005.
- Proposed borings PB-22 through PB-25, PB-31, PB-32, and PB-26 through PB-30 are located along the product piping. The above-mentioned letter from HCDEH requested additional information on the rationale for the location and number of the proposed borings. As stated above, there is significant of shallow contamination at the site, which would indicate the piping runs or dispensers as a potential source of the contamination. The above-mentioned borings are proposed to evaluate any source areas of contamination from suspected releases along these product piping runs or beneath the dispensers. The locations of the proposed borings were specifically chosen at known piping run fitting locations, at the ends of each piping run, and at 20 linear feet intervals along straight sections of the piping runs. In each boring, soil sampling will commence at approximately two feet (2) bgs, at a depth just below the piping. All soil samples will be subject to field screening using visual observations and vapor analysis using a PID vapor analysis. All soil samples from the unsaturated zone, which exhibit visual evidence of contamination or PID readings in excess of 25 ppm will be retained and submitted for laboratory analysis. From boring which show no evidence of contamination, the soil sample collected beneath the piping will be submitted for laboratory analysis. All borings will be extended to the groundwater and a grab groundwater sample will be collected for laboratory analysis. SounPacific notes that previous samples were collected along the piping runs in 1991. However, SounPacific recommends collecting additional samples along these piping runs to due to the time elapse since that sampling was conducted and to further evaluate assess possible source(s), which may now be present and contributing contaminant mass to the dissolved phase contamination plume. In addition, borings PB-22, PB-30, and PB-34, will be extended to depths of approximately 30 feet bgs to evaluate the vertical distribution of any petroleum contaminants. In each of these borings, grab groundwater samples, along with soil samples, if possible, will be collected at approximate depths of 15 feet and 30 feet bgs for laboratory analysis with the objective of evaluating any vertical migration of contaminants. These samples will be

analyzed for the same compounds as the already scheduled samples and are in addition to already planned soil and groundwater sampling.

- Borings PB-37 through PB-40, located on the west side of Center Avenue are proposed to further delineate the downgradient lateral extent of the identified groundwater contamination. In addition, to evaluate and delineate the vertical extent of any TPHg and MTBE contamination depth discrete sampling will be conducted in borings PB-37 and PB-39. In both borings, they will be extended to a depth of 30 feet bgs with sampling and analysis being conducted in the same manner as presented above.

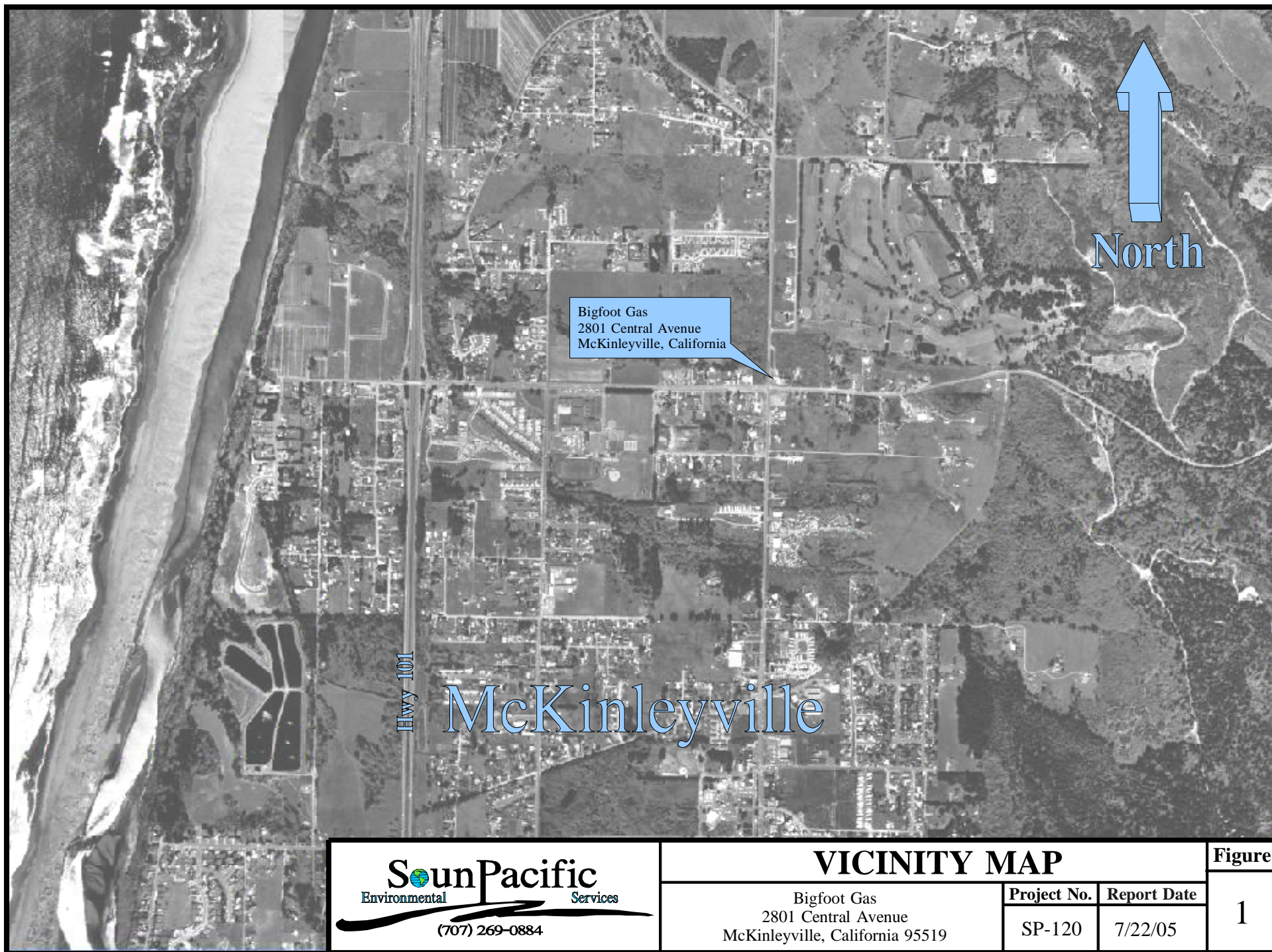
If you have any further questions, please do not hesitate to call either myself at 269-0884 or SounPacific's Registered Geologist, Michael Sellens at (916) 966-8502.

Sincerely,
SounPacific



Andy Malone
Project Director

cc: Kasey Ashley, North Coast Regional Water Quality Control Board
Rich Pomrehn, Big Oil & Tire Co.



SounPacific
Environmental Services
(707) 269-0884

VICINITY MAP		
Bigfoot Gas 2801 Central Avenue McKinleyville, California 95519	Project No.	Report Date
	SP-120	7/22/05

Figure
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